

PLANNING STATEMENT

**RESIDENTIAL DEVELOPMENT:
HOLYWELL, SWORDS, FINGAL**



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1.0 INTRODUCTION AND DOCUMENT PURPOSE

The Planning Partnership, The Coach House, Dundanion, Blackrock, Cork, T12 T6YC, has been retained by Fingal County Council as part of a multi-disciplinary consultancy team to deliver a Residential Development (5,189 sq m Gross Floor Space) arranged over 3 no. buildings ranging in height from 4 to 6 storeys, consisting of no. 57 no. residential units (20 no. 1-bedroom apartments, 29 no. 2-bedroom apartments, and 8 no. 3-bedroom apartments), ancillary infrastructure and all associated site development works, at a site of approximately 0.77 ha located in the Townland of Crowcastle, Holywell, Swords, Co. Dublin. The site is located in a prominent position to deliver and cater for existing and projected population growth of Swords.

Key issues of the development *inter alia* included items such as tree and hedgerow details as part of the application, public realm and amenity, development impact, day light and sunlight assessments, boundary treatments integrated as part of the design, and the incorporation of SUD proposals.

The subject site benefits from current live Planning Permission (Fingal County Council Reg. Ref. No. F18A/0335) for 29 residential units within a 2/3 storey duplex/apartment, terraced and semi-detached buildings, and is due to expire in April 2024.

The design and conceptualisation of the scheme has been advised, informed and necessarily supplemented by the inputs of the following members of the Design Team:

- **Fingal County Council** (Promoter)
- **The Planning Partnership** (Planning Consultant)
- **Henchion and Reuter Architects** (Scheme Architect)
- **DFLA** (Landscape Architect)
- **Roughan & O'Donovan** (Consulting Engineers)
- **EOBA** (Fire Engineering)
- **Walsh Associates** (Quantity Surveying)

1.1 Planning Statement

This *Planning Statement* presents the planning and design rationale for a 57 no. unit residential development, forming an integrated and sustainable community.

The presented development represents a 'plan-led' development in accordance with land use zoning and housing objectives and development management standards contained within the relevant development plan(s) including the *Fingal Development Plan 2023-2029*, the *National Planning Framework (2018)* and *A New Housing Plan for Ireland Housing for All (2021)*.

In presenting the proposal on the basis of the first principles, the design and the layout of the scheme have sought to positively respond to the challenges and character of the surrounding areas, to preserve and enhance residential amenity and connectivity, whilst achieving an appropriate increase in density at this primarily residentially zoned infill opportunity site, while acknowledging the public open space amenity lands in the south, as to reflect both the best use of urban lands whilst respectful of neighbouring amenities and surrounds.

The outline structure of this Planning Statement is as follows:

Section 1 – Introduction: introduces the subject application, providing details of the residential demand in Fingal for such a development and an executive summary which demonstrates the objective of the development as well as the residential and open space breakdown.

Section 2 – The Concept Proposal: A development description is included, the evolution of the concept is set out which outlines height, massing and mitigation efforts taken to integrate the development within its receiving environment, the key figures in the presented development, the flood risk and the planning history.

Section 3 – Policy Context: reviews and provides statements of compliance for relevant guidelines, policies and objectives as expressed at national, regional, and local scales to demonstrate the consistency of the subject development within the planning context.

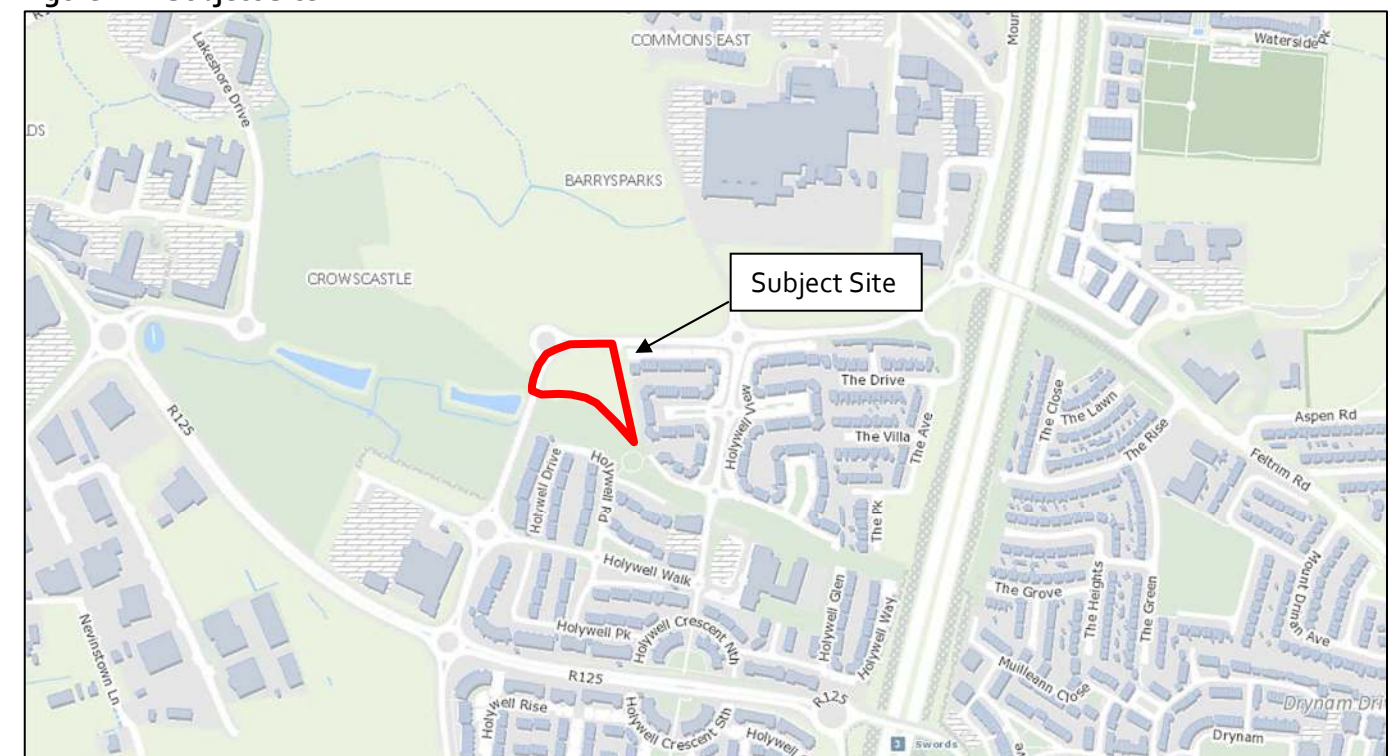
1.2 Site Location and Context

The lands are located to the southeast of Swords Town Centre approximately 2.2km distance from the town centre. The lands are formed by a greenfield site and bordered by Holywell North Park and residential development on the east and south sides of the site, and to the north and west by the link road section that links to the R125 to the south and Mountgorry Way to the east.

It is also noted that the site is bordered by hedgerows located along the southern and eastern edge of the site. To the north and northwest of the site, the area is characterised by extensive commercial uses.

The subject site is considered an infill 'greenfield site' which is suitable for development.

Figure 1.1: Subject Site.



Source: ESRI ArcGIS, Annotated and Reproduced under Licence by The Planning Partnership September 2023

Figure 1.2: Subject Site.



Source: ESRI ArcGIS, Annotated and Reproduced under Licence by The Planning Partnership September 2023

1.3 Residential Demand in Fingal

The surrounding built environment can be characterised by greenfield sites, residential developments and industrial/ commercial developments, a development pattern is emerging that supports the different industries that can be located to the north of Dublin City, the result of this is an increased demand for housing.

Regarding connectivity the site is serviced by a series of roads for private vehicle use, public transport, the M1 motorway and the proposed Metrolink. This will result in further pressure on the area for residential development. If the area is to continue to grow in a manner that is sustainable and fulfil the projections that have been detailed as part of RSES then further residential development will need to be facilitated.

In recent times, there has been much more focus on core policies for support of increases in residential developments. *Fingal Development Plan 2023-2029* has established that all zoned lands including the subject site are serviced and located alongside existing or planned public transport routes. Fingal County Council also aims to continue to pursue the goals of the consolidation of Dublin City through the compact development of the Dublin City and suburbs area within Fingal. It has been stated that one of the roles of Swords is to accommodate 20% of the phased population growth targeted in the principal city or suburban area to be accommodated in the wider metropolitan area. This will be subject to:

- Any relocated growth being in the form of compact development, such as infill or a sustainable urban extension.
- Any relocated growth being served by high-capacity public transport and/ or related to significant employment provision.
- National Policy Objective 9, as set out in Chapter 4 of the NPF.

The population of Fingal has been projected to grow by a further 369,000 people by 2031 which is a continuation in the trend that has been made visible over the last 10 years. Airport related business, commercial facilities and employment linked to the future development of the MetroLink is conducive to an increased demand for residential developments.

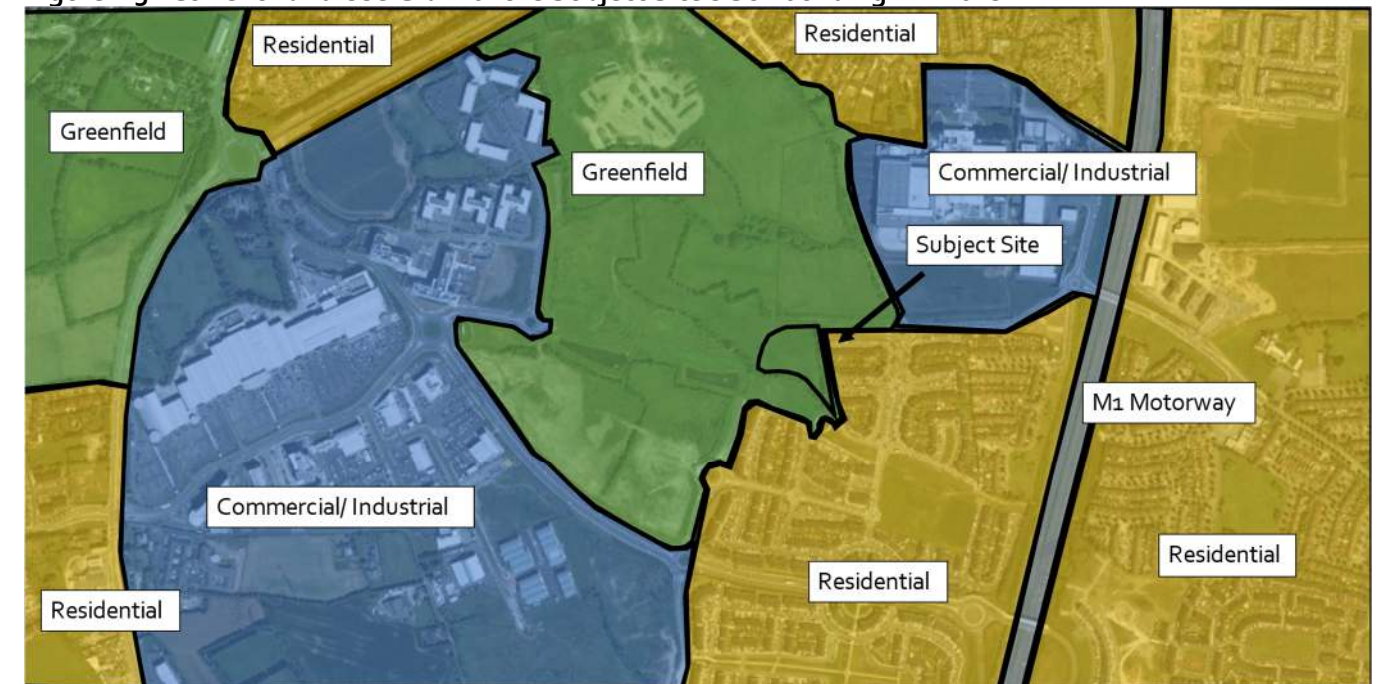
2.0 THE PRESENTED HOLYWELL DEVELOPMENT CONCEPT PROPOSAL

The objective of the project is to provide a Residential Development (5,189 sq m Gross Floor Space) arranged over 3 no. buildings ranging in height from 4 to 6 storeys, consisting 57 no. residential units (20 no. 1-bedroom apartments, 29 no. 2-bedroom apartments, and 8 no. 3-bedroom apartments), ancillary infrastructure and all associated site development works, at a site of approximately 0.77 ha located in the Townland of Crowcastle, Holywell, Swords, Co. Dublin, located to serve the projected growth in the population and to cater for any economic expansion in the area.

This development will facilitate the expansion and growth of Swords whilst working to consolidate its suburbs as part of this.

It is expected that the working population in Fingal will increase with an additional 18,612 people by 2029, with forecasted local employment availability of 13,090 between 2020 and 2029. In order to cater for this economic expansion, residential infrastructure is to be in place to cater for such projected demands.

Figure 1.3: Current Land Use Grain of the Subject Site's Surrounding Environs.



Source: ESRI ArcGIS, Annotated and Reproduced under Licence by The Planning Partnership September 2023

This Residential Development is to accommodate population and economic growth in the area while reducing potential impacts on the receiving environment and neighbouring developments.

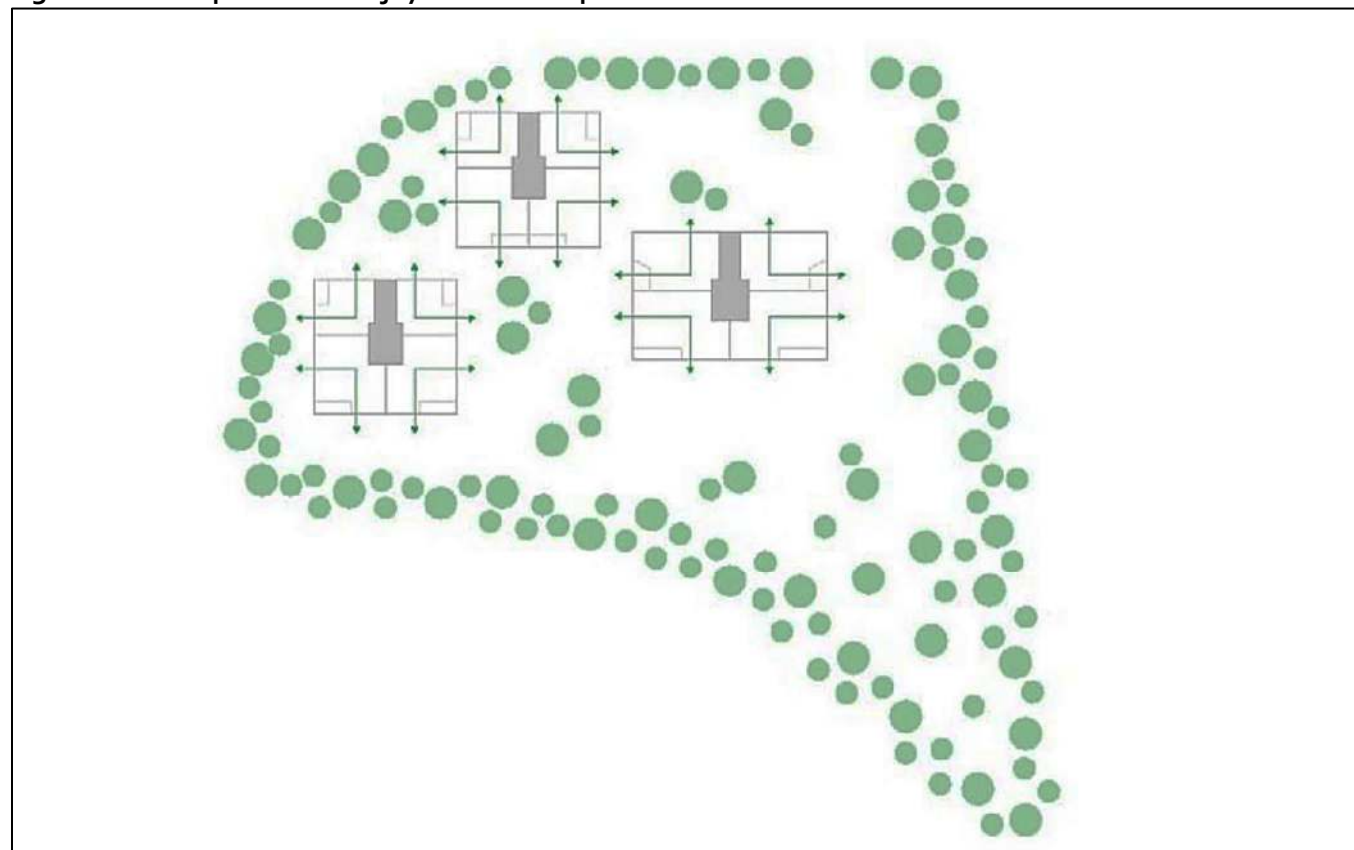
2.1 Concept Evolution and Design Justification

The subject site and its surrounding context present a rapidly growing network of business and residential developments. The provision of an adequate supply of housing in keeping and complementing neighbouring development, will not only contribute positively to an enhanced quality of life in the community but will ensure that the growth that does take place is sustainable and healthy.

To achieve such, the impact of the development is mitigated through careful and considerate design protocol. Statutory guidance and precedence set by neighbouring developments has guided the development to be implemented, and the design proposal anticipates the future development by adopting a pavilion typology with a landscape flowing between the pavilion blocks.

Fingal Development Plan 2023-2029 aims to promote growth and consolidation through the guidance of *Urban Development and Building Heights – Guidelines for Planning Authorities 2018*.

Figure 2.1: All Apartments enjoy a Garden Aspect.



Source: Henchion and Reuter Architects, September 2023

Three detached blocks are distributed on the site to allow a continuous landscape to be threaded between them. In this way all apartments look out onto the shared landscape rather than being orientated to the street.

A mix of apartment Universal Design sizes (one, two and three bed apartments) has been presented to reflect the need to support different varieties of households. Within each apartment block, the larger apartments are placed on the southern side so that families have the benefit of the southern aspect and the deeper garden aspect. The southern side is also the quieter side of the building.

Figure 2.2: Site Plan Demonstrating the Development in its Receiving Environment.



Source: Henchion and Reuter Architects, September 2023

The presented development achieves a density of 74 no. residential units to the hectare and is in line with the 2009 *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas*, and also in line with the aims of the *National Planning Framework (NPF)* which seeks to increase building heights and densities.

The presented development is in compliance with the *Sustainable Urban Housing: Design Standards for New Apartments 2020* and have been designed in accordance.

The following Key Design Objectives are identified:

Building Form, Height and Massing: The three pavilion blocks present Block A to the west at five storeys, the central Block B at 6 storeys, and Block C to the east is 4 storeys. This distribution of height and mass supports the articulation of the individual pavilions (thereby avoiding the perception of one large mass), appropriately scaled in keeping with the distance between them and the existing neighbouring residences.

The presented development does not create any blank gables, with the distribution of the landscaping 'softening' the visual impact of the new buildings. The facades of the buildings have been broken up with large windows and balconies creating an active frontage which improves how the building is received into its environment.

Dual Aspect Throughout: The pavilion typology with a compact central core in each block presents that all apartments are double aspect. In fact, most of the living spaces enjoy double aspect and all apartments enjoy a view of the shared landscape.

This layout has enabled the development to significantly reduce its volumetric presence in Holywell, Swords, while respecting the character and sensitivity of the existing landscape.

Universal Design: Acknowledging the *Fingal County Development Plan 2023* requirement that 30% of units (by area) are designed to be to Universal Design Standard. All units in Block C are laid out to this standard, inclusive of a larger 13 person lift service.

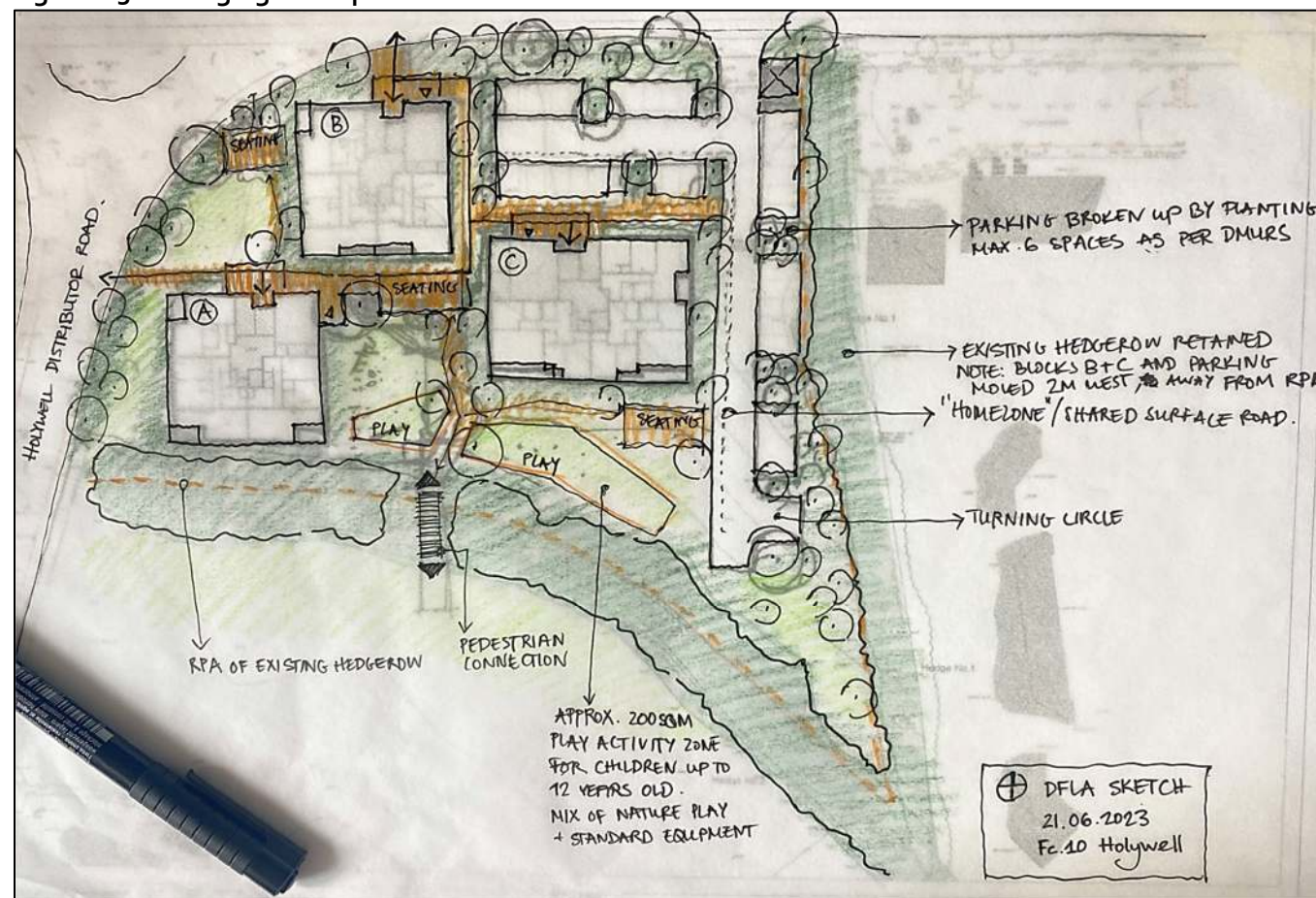
Optimisation of Residential Amenity for the Neighbouring Residents: The set back and distance of the presented development takes full advantage of such in order to effectively integrate the development within its receiving environment, with the distribution of the landscaping 'softening' the massing of the development from neighbouring sites as well as from the road.

As stated above, the presented development does not create any blank gables, and the distribution of varying building heights from 4 to 6 six storeys, supports the articulation of the individual pavilions (thereby avoiding the perception of one large mass), and is appropriately scaled in keeping with the distance between them and the existing neighbouring residences.

Entrances and Arrival: Primary vehicular and pedestrian access to the presented development will be at three different points at the north and the west of the site, these entrances will be located on the Holywell Distributor Road. Enhanced pedestrian permeability will be provided to surrounding open space. Landscaping will be used to enhance these features while mitigating the impact of them.

Walking and cycling are the most efficient modes of travel in terms of use of road-space, and the most sustainable in terms of environmental impacts. Cycle parking facilities have been conveniently located within a secure, easy to use, adequately lit and in a well signposted area.

Figure 2.3: Emerging Concept Evolution



Source: Henchion and Reuter Architects, July 2023

2.2 Landscape Integration

The presented development concept has been designed to have minimal environmental impact. To ensure this care was taken with the design and layout of the site as well as mitigation efforts through landscaping to reduce the impact of the development on surrounding sites. Biodiversity, ecology, and wildlife are key facets of consideration in the development of the site layout.

The protection of hedgerows as part of the environmental consideration in development have been referred to at length as part of the *Fingal Development Plan 2023-2029* for their role as part of habitats, biodiversity corridors as well as the role that they play as part of Fingal's green infrastructure network.

The existing hedgerows along the southern and eastern site boundaries are to be retained. In addition, substantial tree planting is introduced in the landscape proposals to improve the proportion of native species on site and to build on the existing character of the area.

The existing hedgerows are preserved and incorporated into the design where possible as recommended in the *Fingal Development Plan 2023-2029*:

Objective GI 18 "Ensure trees, hedgerows and other features which demarcate townland boundaries are preserved and incorporated into the design of developments."

The landscape design facilitates circulation, seating, bicycle parking, fire tender access and at the same time ensures abundance of vegetation and flexibility of use and provides opportunities for passive and active recreation and visual amenity.

The following components make up the overall landscape strategy:

- A diverse and attractive range of open space, including hard and soft landscape areas with tree planting and ground flora;
- Provision of informal natural play equipment within the communal open space;
- Improved permeability throughout the site for pedestrians and cyclists, with consideration given to the wider masterplan strategy for Swords;
- Integration of SUDS, functional landscape, and external works to ensure accessibility to parking areas and building cores.

Low planting is utilised to create and reinforce sub-spaces within the larger landscape; for visual screening, defensible space, visual interest, ecological purposes and to guide or direct pedestrian's movement. The low planting is conceived as subtle layering of greens within the open spaces. The planting is layered as follows; lowest - bulb planting, groundcover planting, highest - clipped hedge planting.

This low-planting strategy works in conjunction of promoting stepping stones as stated in the Development Plan.

Objective GI 15 "Create a cohesive network of green corridors, green routes/links and stepping stones throughout the lands that facilitate wildlife movement between the residential areas and the surrounding landscape."

The selection of hard landscape materials is determined by function but also to provide a cohesive palette of materials across the site. The open spaces are presented to incorporate several different hard landscape finishes to delineate the different spaces and recreational zones. The materials and furniture in these locations are chosen to create an intimate environment and encourage communal activities.

Figure 2.4: Artist’s impression of the Landscape Strategy for the Presented Development



Source: DBFL, September 2023

2.3 Key Figures of Presented Development

No.	Item	Quantum
1.	Site Area	0.77 ha
2.	Total No. Apartment	57
3.	No. of 1-bedroom apartments	20
4.	No. of 2-bed apartments	29
5.	No. of 3-bed apartments	8
6.	Total Development Gross Floor Area	5,189 sq m
7.	Apartment Building A Gross Floor Area	1,572.9 sq m
8.	Apartment Building B Gross Floor Area	1,894.6 sq m
9.	Apartment Building C Gross Floor Area	1,721.5 sq m
10.	No. Bicycle Storage Building A	48 no. spaces (43.4 sq m)
11.	No. Bicycle Storage Building B	58 no. spaces (45.3 sq m)
12.	No. Bicycle Storage Building C	61 no. spaces (64.8 sq m)
13.	Total Bicycle Storage	223 no. spaces (167 no. long term spaces) (56 no. short term spaces)

14.	Density	74 units per hectare
15.	Accessible/Disabled Parking	3 no. spaces
16.	Accessible/Disabled EV Parking and Charging	1 no. space
17.	EV Parking and Charging	7 no. spaces
18.	Vehicle Parking	23 no. spaces
19.	Total Vehicle Parking	34 no. spaces

2.4 Planning History

To derive an understanding of development trends and potential interactions between different forms of development associated with the subject site, a review of recent relevant Planning History was undertaken.

File No.	Application Status	Decision Date	Development Description
F18A/0335	This application was received by Fingal County Council on 18 Jun 2018 and registered on 30 Oct 2018. On 21 Nov 2018, the decision GRANT PERMISSION was made by Fingal County Council.	21/11/2018	A residential development on a 0.77 ha site bounded by Holywell Avenue & Holywell Court to the east, Holywell Drive & Holywell Gardens to the south and to the north and west by the recently constructed link road section that links to the R125 to the south and Mountgorry Way to the east. Access to the site is from the recently constructed link road section that bounds the development to the north. The proposed development comprises 29 dwellings in the following mix: A 2/3 storey duplex/apartment building 7 no. 2-bedroom ground floor apartments, 2 no. 1-bedroom ground floor apartments, 9 no. 3-bedroom duplex units and 2 no. 2-bedroom two storey apartments. The development also consists of 9 no. two houses comprising 3 no. 3-bedroom mid-terraced Type B units; 2 no. 3-bedroom end of terrace Type B1 units; 2 no. 4-bedroom semi-detached Type C units and 2 no. 3-bedroom semi-detached Type D units together with all associated site development/car parking/landscaping works.
F02A/0729	On 18 Feb 2003, a decision GRANT PERMISSION & REFUSE PERMISSION was made by Fingal County Council on this application. Subsequently, an appeal was lodged on 18 Mar 2003 and a decision to Appeal Withdrawn was made	18/02/2003	Residential development including local services centre, site for proposed primary school and open space. The site is bounded by proposed link road from Malahide to Feltrim to the north, The Melrose Housing Estate at Kinsealy, and M1 Motorway (presently under construction) at Drinan, to the west. The lands comprise those contained within the Nevinstown A1 Residential Action Plan. The residential development provides for a total of 1183 residential units, comprising 548 houses and 635 apartments, of which there are 46 one bedroom, 741 two bedroom, 386 three

File No.	Application Status	Decision Date	Development Description
	by An Bord Pleanála on 02 Apr 2003.		bedroom and 10 four-bedroom units ranging in height from 2/2 1/2 and 3 storeys. The development comprises one local services centre (697.2 sq.m.) containing 1 creche (390.2sq.m.), 1 retail unit (113 sq.m.), 1 medical facility (97 sq.m.) and a pharmacy (97 sq.m.) in a single building of 1 1/2 storeys. Access to the development is from the existing main road through Airside Business Park to form a new distributor road, extending from the existing N1 to the proposed M1 motorway. Pedestrian/cycle provisions will be incorporated alongside the proposed distributor road. An Environmental Impact Statement is being submitted with this planning application.
F03A/0936	This application was received by Fingal County Council on 23 Jul 2003 and registered on 23 Jul 2003. On 10 Mar 2004, the decision GRANT PERMISSION was made by Fingal County Council.	10/03/2004	A residential development including local services centre, site for proposed primary school and open space. The site is bounded by the proposed link road from the N1 to the realigned Feltrim Road, to the north and the Melrose housing estate at Kinsealy, and M1 motorway at Drinan to the east. The lands comprise those contained within the Nevinstown A1 Residential Action Plan. The residential development provides for a total of 1188 residential units, comprising 546 houses and 642 apartments, of which there are 44 one bedroom, 754 two bedroom, 380 three bedroom and 10 four bedroom units ranging in height from two to two and a half and three storeys. The development comprises 1 local services centre (730.95 sq.m.), containing 1 creche, (423.95 sq.m.), 1 retail unit (113 sq.m.), 1 medical facility (97sq.m.) and a pharmacy (97 sq.m.) in a single building of one and a half storeys. Access to the development is from the existing main road through Airside Business Park to form a new distributor road, extending from the existing N1 to a proposed interchange at the M1 motorway. Pedestrian/cycle provisions will be incorporated alongside the proposed distributor road. An Environmental Impact Statement is being submitted with the planning application.

3.0 SPATIAL PLANNING AND POLICY CONTEXT

The Statutory Development Planning Context is a constant fluid environment. Any proposals associated with the delivery of a new Residential Development within Holywell, Swords, will be informed by a wide range of national, regional and local planning policy documents.

The importance of the *Project Ireland 2040 National Planning Framework*, the *Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy 2019-2031*, and the *Fingal Development Plan 2023-2029*, is acknowledged and of particular relevance in guiding the nature and extent of development proposals.

The following analysis of relevant guidelines, policies and objectives as expressed at a national, regional and local level has been prepared to demonstrate the consistency of the subject development within the planning context.

3.1 Delivering Project Ireland 2040

Project Ireland 2040 – National Planning Framework (NPF) was published in February 2018 and constitutes the primary strategic planning document for the country as a whole. This document has established a singular vision for development and investment in Ireland which is intended to guide population growth, infrastructure delivery, social and economic development throughout Ireland through to 2040. It is a strategic planning policy document prepared for the national tier of planning governance. It aims to improve the strategic planning of Ireland and its regions to improve economic performance and the quality of life of its citizens.

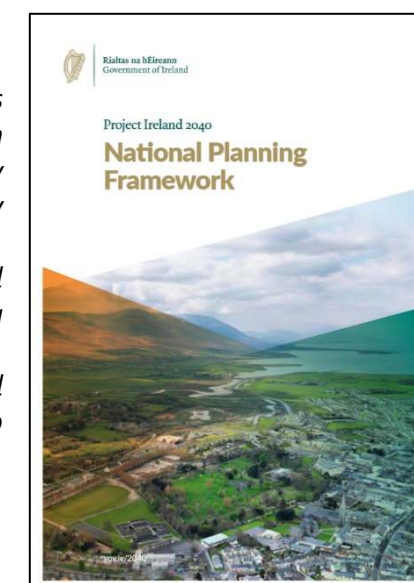
The NPF acknowledges that within the Eastern and Midland Region there needs to be more emphasis on consolidating the development of places that grew rapidly in the past decade or so with large scale commuter driven housing development which focuses on addressing local community and amenity facility provision in many of the larger commuter towns through targeted investment under relevant NPF National Strategic Outcomes.

The NPF sets out 10 National Strategic Outcomes and 75 National Policy Objectives, to enable all parts of Ireland, whether rural or urban, to successfully accommodate growth and change.

The presented Residential Development for Holywell, Swords, is in pursuance of the following National Strategic Outcomes as providing high quality housing, well-designed public realm and landscaping, extensive amenity infrastructure, and integrating *inter alia* the current Fingal built environment.

National Strategic Outcome No. 1 Compact Growth which outlines that:

“Carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work. All our urban settlements contain many potential development areas, centrally located and frequently publicly owned, that are suitable and capable of re-use to provide housing, jobs, amenities and services, but which need a streamlined and co-ordinated approach to their development, with investment in enabling infrastructure and supporting amenities, to realise their potential. Activating these strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development, is a top priority.”



National Strategic Outcome No. 5 *A Strong Economy, supported by Enterprise, Innovation and Skills* which outlines that:

"This will depend on creating places that can foster enterprise and innovation and attract investment and talent. It can be achieved by building regional economic drivers and by supporting opportunities to diversify and strengthen the rural economy, to leverage the potential of places. Delivering this outcome will require the coordination of growth and place making with investment in world class infrastructure, including digital connectivity, and in skills and talent to support economic competitiveness and enterprise growth."

National Strategic Outcome No. 7 *Enhanced Amenity and Heritage* which outlines that:

"This will ensure that our cities, towns and villages are attractive and can offer a good quality of life. It will require investment in well-designed public realm, which includes public spaces, parks and streets, as well as recreational infrastructure. It also includes amenities in rural areas, such as national and forest parks, activity-based tourism and trails such as greenways, blueways and peatways. This is linked to and must integrate with our built, cultural and natural heritage, which has intrinsic value in defining the character of urban and rural areas and adding to their attractiveness and sense of place."

Figure 3.1: Strategic Investment Priorities in response to National Strategic Outcomes



Source: Project Ireland 2040 – National Planning Framework

The presented new Residential Development for Holywell, Swords, is in pursuance of the following National Policy Objectives as providing high quality residential development through well-designed units and mitigation efforts taken to integrate the development within its receiving environment and neighbouring sites, all while integrating with *inter alia* the current Swords built environment.

National Policy Objective 3a

"Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements."

National Policy Objective 3a

"Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs within their existing built-up footprints."

National Policy Objective 4

"Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being."

National Policy Objective 6

"Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area."

National Policy Objective 13

"In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected."

National Policy Objective 27

"Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages."

National Policy Objective 30

"Local planning, housing, transport/accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans."

National Policy Objective 32

"To target the delivery of 550,000 additional households to 2040."

National Policy Objective 33

"Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location."

National Policy Objective 34

"Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time."

National Policy Objective 35

"Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights."

National Policy Objective 57

"Enhance water quality and resource management by:

- *Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities."*

National Policy Objective 75

"Ensure that all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate."

Statement of Consistency – National Planning Framework

The development is presented as an attractive, liveable, safe, and well-designed extension of an expanding residential neighbourhood on a primarily residentially zoned infill opportunity site, while acknowledging the public open space amenity lands in the south. It is respectfully presented to be in accordance with National Policy Objectives of achieving a significant proportion of future urban development in existing towns and as allowing for an increase in residential density which will build the critical mass of population growth as to support the projected expansion of Swords.

3.2 Regional Spatial and Economic Strategy for the Eastern and Midland Regional Area

The principal statutory purpose of the *Regional Spatial and Economic Strategy for the Eastern and Midland Regional Area* (RSES) is to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Region. The RSES is required under the Planning and Development Act 2000 to address employment, retail, housing, transport, water services, energy and communications, waste management, education, health, sports and community facilities, environment and heritage, landscape, sustainable development, and climate change.

The Strategy is underpinned by three key principles:

- Healthy Placemaking;
- Climate Action; and
- Economic Opportunity.



The current RSES has made clear as part of its Strategic Investment Priorities that Housing and Sustainable Urban Development takes precedence at the top of its list. The vision that underpins this plan and principles makes direct reference to the development of residential space:

"To create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all".

In relation to the delivery of housing, RSES outlines a clear strategy underpinned by a number of objectives. The NPF and Rebuilding Ireland identifies a target of at least 25,000 annual new homes required nationally to satisfy housing needs to 2040 and an increased national output of 30,000 to 35,000 to 2027.

The MASP also identifies opportunities for some 113,000 residential units when fully built out to 2040, this will meet the projected populations in the MASP to 2026 to 2031. The MASP is focussed on a phased and sequential delivery of a steady stream of sites to meet demand including the identification of long term strategic future development areas.

The Residential Development at Holywell, Swords, is in pursuance of the following **RSES Regional Policy Objectives** associated with Housing Delivery as providing the supply of quality, affordable housing in underpinning economic growth and competitiveness of the Dublin metropolitan area.:

RPO 5.4: Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas'13, 'Sustainable Urban Housing: Design Standards for New Apartments' Guidelines and 'Urban Development and Building Heights Guidelines for Planning Authorities.

RPO 5.5: Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.

Statement of Consistency – RSES

The residential development presented is consistent with the provisions of Sword's role in the *Regional Spatial and Economic Strategy for the Eastern and Midland Regional Area* in providing for high quality residential development and will provide for the population growth, and critical mass required, to drive economic development and a sustainable economy, while making the best use of under-utilised primarily residentially zoned infill lands and of economic investment in critical infrastructure to date.

3.3 Local Authority Policy Context - Adhering to the Policies and Objectives of the Fingal Development Plan 2023-2029

The presented development will be in accordance with the policies and objectives within the *Fingal Development Plan 2023-2029*.

The delivery of quality housing and the practice of sustainable placemaking is a key component of the Development Plan. The projected population growth and requirement of a further 16,245 new homes by 2029 is also outlined within this plan.

In order to deliver these objectives and requirements, a series of strategic aims are detailed, the most applicable being:

- *Deliver successful and sustainable communities through the provision of infrastructure, a range of housing typologies and tenure options, open space, retail, leisure, employment, community, and cultural development supporting the needs of residents, workers, and visitors, whilst conserving our built and natural heritage;*
- *Require that the principle of healthy placemaking underpins the design and functionality of new and expanding communities;*
- *Ensure communities develop in a coordinated sustainable manner to create vibrant and viable places and ensure new development respects the character of existing centres.*



The presented new residential development for Holywell, Swords, is in pursuance of the following of the following policy associated with Sustainable Placemaking and Quality Homes as outlined in Chapter 3 of the *Fingal Development Plan 2023-2029*.

Policy SPQHP1: The Council will support the development and creation throughout Fingal of successful and sustainable settlements which endorse the principles of healthy placemaking and which through a multi-faceted approach to planning, design and management continue to ensure the development of attractive high-quality places to live, work, recreate, visit and invest in, served by a range of local services, provision of quality public realms, diverse and accessible community facilities for all genders, non-binary or none and open spaces for the benefit of the community.

Policy SPQHP42: Support the provision of family flats on suitable sites within established residential areas subject to specific design criteria.

Objective SPQHO46: Support development which enhances the quality of the built environment, promotes public health, and supports the development of sustainable, resilient communities.

Objective SPQHO6: Promote and facilitate a Universal Design for all developments.

Policy SPQHP9: Implement the adopted Fingal County Council Housing Strategy, which includes the *Housing Need and Demand Assessment 2023 - 2029* (and any superseding Housing Strategy agreed by the Members of Fingal County Council).

Policy SPQHP10: Support the implementation of and promote development consistent with the National Strategic Outcome of Compact Growth as outlined in the NPF and the Regional Strategic Outcome of Compact Growth and Regeneration as set out in RSES.

Objective SPQHO9: Consolidate within the existing urban footprint, by ensuring of 50% of all new homes within or contiguous to the built-up area of Dublin City and Suburbs and 30% of all new homes are targeted within the existing built-up areas to achieve compact growth of urban settlements, as advocated by the RSES.

Objective SPQHO10: Focus new residential development on appropriately zoned lands within the County, within appropriate locations proximate to existing settlement centres where infrastructural capacity is readily available, and along existing or proposed high quality public transport corridors and active travel infrastructure in a phased manner, alongside the delivery of appropriate physical and social infrastructure.

Objective SPQHO11: Ensure that adequate and appropriate housing is available to meet the needs of people of all incomes and needs including marginalised groups within our communities.

Policy SPQHP29: Support the initiatives proposed under Housing for All – A New Housing Plan for Ireland in providing for Fingal’s requirements for social affordable and cost-rental housing provision within Fingal, including with a focus on the development of publicly owned sites with support from state agencies where appropriate and the preparation of Local Authority Delivery Action Plans.

Policy SPQHP30: Promote the provision of social, affordable and cost rental housing in accordance with the *Fingal County Council Housing Strategy*, Part V of the *Planning and Development Act 2000* (as amended) by the *Affordable Housing Act 2021* and government policy as outlined by the Department of Housing Local Government and Heritage *Housing for All – A new Housing Plan for Ireland to 2030*.

Policy SPQHP31: Support Local Authorities, Approved Housing Bodies and other sectoral agencies in the provision of a greater diversity of housing type and tenure including social and affordable housing and explore new models of low-cost rental and affordable home ownership.

Policy SPQHP35: Promote a high quality of design and layout in new residential developments at appropriate densities across Fingal, ensuring high-quality living environments for all residents in terms of the standard of individual dwelling units and the overall layout and appearance of developments.

Objective SPQHO31: Encourage the creation of attractive, mixed use and sustainable residential communities which contain a wide variety of housing and apartment types, sizes, tenures and typologies in accordance with the *Fingal County Council Housing Strategy*, the *Housing Need and Demand Assessment 2023 - 2029* with supporting community facilities, amenities and services.

The Development Plan also makes direct reference to the aims to promote compact growth and consolidation within Fingal’s large urban areas and also how it will support appropriate densities as expressed in national and regional policies such as NPF, RSES and Section 28 Guidelines.

The site which is the focus for delivery of the new Residential Development in Holywell, is primarily subject to *RS – Residential* land use zoning designation in terms of the *Fingal Development Plan 2023-2029*, the stated objective of which is to: “*Provide for residential development and protect and improve residential amenity*”.

As illustrated within Figure 1. 3 above, and Figure 3.2 below, the character of this area is a mixture of residential, commercial, open space and greenfield in nature.

The Development Plan states that the vision for lands subject to this land use zoning designation is to:

“Ensure that any new development in existing areas would have a minimal impact on and enhance existing residential amenity.”

The following uses are permitted in principle, subject to conditions, on the *RS – Residential* lands:

Bed and Breakfast, Childcare Facilities, Community Facilities, Education, Guest House, Office Ancillary to Permitted Use, Open Space, Residential, Residential Care Home/ Retirement Home, Retirement Village, Sheltered Accommodation, Traveller Community Accommodation, Utility Installations.

The presented new Residential Development for Holywell, Swords, is permitted in principle on the *RS – Residential* land use zoning designation of the lands at this location.

The most southern tip/part of the subject site is subject to *OS – Open Space* land use zoning designation in terms of the *Fingal Development Plan 2023-2029*, the stated objective of which is to: “*Preserve and provide for open space and recreational amenities*”.

No residential construction is proposed on this small part of the site, being physically severed from the new Residential Development by the existing hedgerow vegetation and thereby integrated within the overall open space features of the existing Holywell Residential developed area.

Figure 3.2: Land Use Zoning Designation of the Subject Site and the Surrounding Area



Source: *Fingal Development Plan 2023-2029*, extracted, reproduced and annotated under ESRI ArcGIS and OSI Licence by The Planning Partnership September 2023

The presented new Holywell Residential Development's layout and building design conform to the highest possible standards set out in statutory guidance, as to ensure effective integration of the development within its receiving environment.

The presented new Residential Development for Holywell, Swords, is in pursuance of the following development management standards as outlined within the *Fingal Development Plan 2023-2029*.

Objective DMSO3 – Local Authority Development: Ensure Local Authority development proposals are subject to environmental assessment, as appropriate, including Screening for Appropriate Assessment and Environmental Impact Assessment.

Objective DMSO5 – Design Statement: All medium to large scale planning applications (in excess of 5 residential units or 300 sq m of retail/ commercial/office development in urban areas) or as otherwise required by the Planning Authority shall be accompanied by a Design Statement to address the contextual and design issues which have been taken into consideration as part of the scheme.

SPPR1: Support increased building height and density in locations with good public transport accessibility, particularly town/ city cores. Increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.

SPPR4: Secure minimum densities on greenfield or edge of city/town locations for housing purposes as required under Sustainable Residential Development in Urban Areas 2007, ensure a greater mix of building heights and typologies in planning for the future development of suburban locations; and avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.

Objective DMSO19 – New Residential Development: Require that applications for Residential Developments comply with all design and floor area requirements set out in:

- *Quality Housing for Sustainable Communities – Best Practice Guidelines 2007;*
- *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009, the companion Urban Design Manual – A Best Practice Guide, DEHLG 2009;*
- *Sustainable Urban Housing: Design Standards for New Apartments 2020.*

Objective DMSO23 – Separation Distance: A separation distance of a minimum of 22 metres between directly opposing rear first floor windows shall generally be observed unless alternative provision has been designed to ensure privacy. In residential developments over three-storeys in height, minimum separation distances shall be increased in instances where overlooking or overshadowing occurs.

Objective DMSO24 – Apartment Development: All applications for apartment development are required to comply with the Specific Planning Policy Requirements (SPPRs).

Objective DMSO49 – Permeable and Accessible Open Spaces: Integrate and provide links through adjoining open spaces to create permeable and accessible areas, subject to Screening for Appropriate Assessment and consultation, including the public, as necessary.

Objective DMSO64 – Design of Open Space: Ensure open space provision is suitably proportioned and inappropriate narrow tracts are not provided.

Objective DMSO74 – Screening of Private Open Space: Require balconies, ground floor private open space, roof terraces or winter gardens be suitably screened in a manner complimenting the design of the building so as to provide an adequate level of privacy and shelter for residents.

Objective DMSO196 – Public Foul Sewerage Network Connections: Ensure that all new developments in areas served by a public foul sewerage network connect to the public sewerage system, to comply with the requirements of the Uisce Éireann Foul Sewer specification (where applicable).

Objective DMSO197 – Foul and Surface Water Drainage Systems: Require all new development to provide separate foul and surface water drainage systems and to prohibit the connection of surface water outflows to the foul drainage network and vice versa (prohibit foul to surface water) where separation systems are available.

Objective DMSO203 – FCC SuDS Guidance Document: SuDS shall be incorporated into all parts of a development (open spaces, roads, footpaths, private areas), and have regard to the FCC SuDS Guidance Document – *Green/ Blue Infrastructure for Development, as amended* (Appendix 11), and shall ensure:

- That the design of SuDS enhances the quality of open spaces and when included as part of any open space provision, it must contribute in a significant and positive way to the design and quality of the open space.
- Open space areas shall not be dominated by SuDS features.
- Underground tanked systems, whether concrete or plastic, are the least favoured means for surface water management and shall only be used when green solutions have proven not feasible.

See also Appendix 11 (SuDS Guidance Document) and Chapter 11, Infrastructure and Utilities (Section 11.5.2: Surface Water and Flood Risk Management).

Objective DMSO207 – Green Walls and Roofs for New Developments: Promote and encourage the use of green walls and roofs for new developments that demonstrate benefits in terms of SuDS as part of an integrated approach to green infrastructure provision.

The presented new Residential Development for Holywell, Swords, will complement the general principle that the location and provision of housing is a pre-requisite to the creation and enhancement of viable, sustainable and successful local communities. 223 no. cycle parking facilities have been provided on site as part of the presented development to the requirements of the Development Plan (No. 167 long stay bike spaces and No. 56 short stay bike spaces), these facilities will be located in areas that are secure, easy to use, and adequately lit. An off-street carpark providing no. 34 spaces (incl. 3 no. accessible/disabled, 1 no. accessible/disabled EV and 7 no. EV is presented as part of the new Residential Development for Holywell, Swords, and meets the standards that have been set out as part of *the Fingal Development Plan 2023-2029*.

Statement of Consistency – County Policy

The presented development will provide a greater variety and mix of available residential units proximate to the existing and expanding residential neighbourhoods, which can be supported due to the proximity of active travel options and public transport such as bus services and the planned MetroLink. Accessibility to a range of community infrastructure, employment opportunities, and educational institutes benefits and supports the presented development.

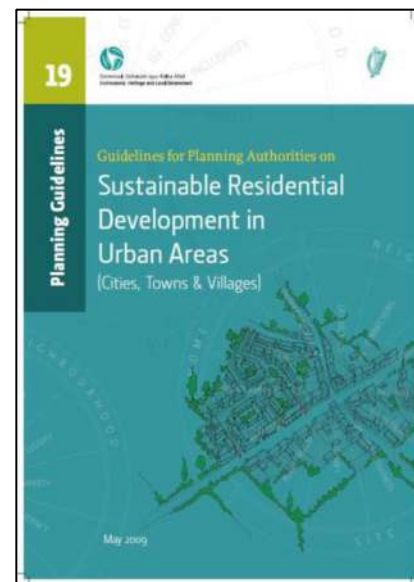
3.4 Sustainable Residential Development in Urban Areas (2009)

These guidelines, published by the Department of the Environment, Heritage and Local Government in 2009, provide specific information on new developments in towns and cities.

The guidance provided within this document emphasises "...the importance of qualitative standards in relation to design..." with the objective of achieving "...an efficient use of land appropriate to its context...". To this end, we highlight the following passages as being of particular relevance to the subject application:

5.1 Firm emphasis must be placed by planning authorities on the importance of qualitative standards in relation to design and layout in order to ensure that the highest quality of residential environment is achieved. Pre-planning discussions with developers will be helpful in achieving a quality environment. The objective should be the achievement of an efficient use of land appropriate to its context, while avoiding the problems of over-development.

5.5 The increase of population within city or town centres with their range of employment, recreation, educational, commercial and retail uses can help to curtail travel demand; therefore, these locations have the greatest potential for the creation of sustainable patterns of development. Increasing populations in these locations can assist in regeneration, make more intensive use of existing infrastructure, support local services and employment, encourage affordable housing provision and sustain alternative modes of travel such as walking, cycling and public transport. While a mix of residential and other uses will often be desirable in city and town centres, particular care is needed to ensure that residential amenity is protected.



5.3 Particular sensitivity is required in relation to the design and location of apartment blocks which are higher than existing adjacent residential development. As a general rule, where taller buildings are acceptable in principle, building heights should generally taper down towards the boundaries of a site within an established residential area.

5.8 The State has committed very substantial investment in public transport under the Transport 21 capital programme. To maximise the return on this investment, it is important that land use planning underpins the efficiency of public transport services by sustainable settlement patterns – including higher densities – on lands within existing or planned transport corridors. The phasing of proposed major residential development in tandem with new public transport infrastructure / services (as in the case of the Adamstown Strategic Development Zone) should be considered.

Statement of Consistency – Ministerial Guidelines 19

The presented development is consistent with the policies outlined for large towns and cities in the *Guidelines for Planning Authorities on Sustainable Urban Development in Urban Areas 2009*. As well as being plan-led, the presented development contributes to the densification of the site and lands in a manner intended and which is envisaged by the Local Authority in Fingal.

3.5 Housing for All – A New Housing Plan for Ireland (2021)

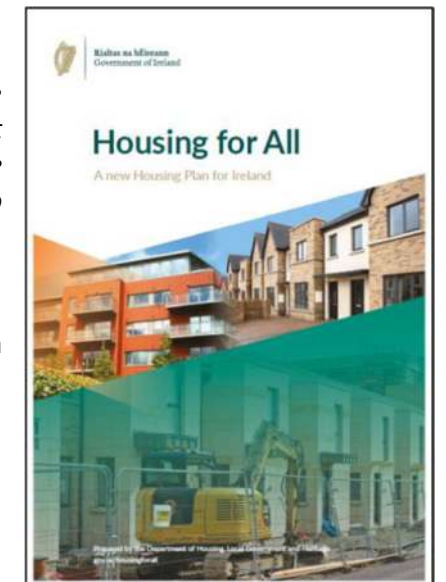
The foreword to the document states:

The Programme for Government – Our Shared Future – sets out the Government's mission to tackle the Housing crisis. Our objective is that everybody should have access to sustainable, good quality housing to purchase or rent at an affordable price, built to a high standard, and located close to essential services, offering a high quality of life.

Housing for All details the concern around the delivery of the Irish housing system for the needs of the people through measures that range from affordability to the enhancement of social housing delivery.

There are several key Housing Policy Objectives that have been set out in which the presented development directly supports, these are:

- Enable Homeownership and Increase Affordability (No.1);
- Work towards Ending Homelessness by 2030 (No.3);
 - "We will roll out the largest house building programme in the history of the State by getting Local Authorities and AHBs back building at scale".*
- Increase Social Housing Delivery (No.4);
 - "The Government will ensure that the ambition of Housing for All is translated into clear, target driven Local Authority delivery action plans".*
- Drive social sustainability and foster sustainable communities (No.21) and;
 - "Sustainable communities are places where people want to live and work. They meet the diverse needs of existing and future residents, are sensitive to their environment and contribute to high quality of life".*
- Drive economic sustainability and reduce Construction Costs (No.23).



"Local Authorities are key enablers of housing within the State, through their planning and economic functions, and their direct responsibility for the delivery of social and affordable housing. They also play a key role in urban and rural regeneration and leading the Town Centre First approach, so that the focus is not only on new supply, but also on tackling vacancy and ensuring the sustainability of communities and the vibrancy of all our cities, towns and villages".

The presented Residential Development at Holywell, Swords, supports the objectives of *Housing for All* and the Government's strategy to increase the delivery of social housing, promote social inclusion and to deliver a target of 33,000 homes per year by 2024. It will also aid in the reduction in availability of housing choice, the costs of construction and the rate of homelessness in the country. The implementation of such a strategy is believed to be able to embed environmental, economic, and social sustainability into the housing system.

The development presented is therefore in line with the proper planning and sustainable development of the Holywell, Swords area.

Statement of Consistency – Housing for All

The presented scheme presents an opportunity to increase housing supply within the confines of the existing town on an infill greenfield site, appropriately serviced by existing road, transport and services infrastructure. All of these can be activated to assist in increasing new housing supply.

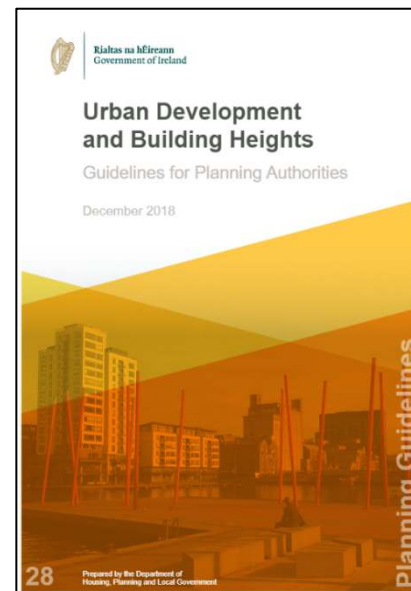
3.6 Urban Development and Building Heights – Guidelines for Planning Authorities (2018)

The purpose of these guidelines is to ensure that development which takes place as part of the National Planning Framework, is done so in a way that allows for an increase in scale, density and height. It must encompass an appropriate mix of both the living, working, social and recreational space available.

The presented Residential Development in Holywell, Swords, has been designed and laid out in such a way that can deliver additional housing and economic development to urban areas while reinforcing and contributing to the sense of place within its receiving environment. The presented development is in support of a number of different Specific Planning Policy Requirements:

(SPPR 1) *In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.*

(SPPR 2) *In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities.*



Statement of Consistency - Urban Development and Building Heights – Guidelines for Planning Authorities

The three pavilion blocks present Block A to the west at five storeys, the central Block B at 6 storeys, and Block C to the east is 4 storeys. This distribution of height and mass supports the articulation of the individual pavilions (thereby avoiding the perception of one large mass), appropriately scaled in keeping with the distance between them and the existing neighbouring residences.

The presented scheme is in compliance with the guidelines that have been set out and presents an opportunity to fulfil the objectives that have been outlined within the Guidelines above in relation to increasing building heights and density in areas that are appropriate. As a result of this it will be possible for it to remain consistent with national statutory guidance.

The presented Residential Development offers an opportunity to accommodate projected population increases in Fingal through the implementation and use of height and density with a minimal impact on the surrounding environment and residential amenity.

3.7 Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2022)

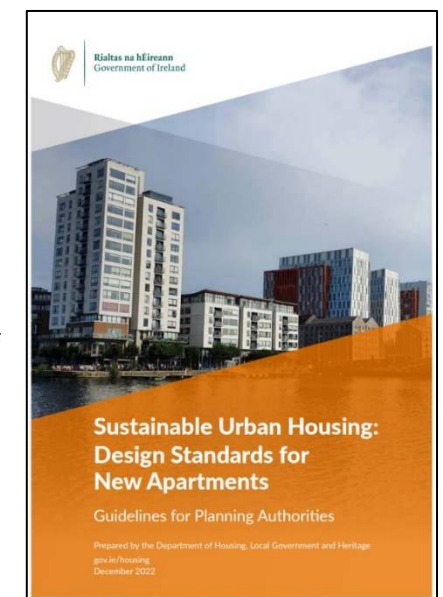
These guidelines issued by the Department of Housing, Local Government and Heritage in 2022 detail specific requirements in relation to the development of new apartments in Ireland as well as demonstrating the need for further apartments in urban areas. Future housing need projections indicate that there is a growing need for development in urban areas and apartments offer a solution to the requirements of an ageing and a young population.

The requirements set out in this document ensure that new apartments constructed are attractive, desirable and can accommodate a range of household types and tenures. They set out design standards as well as the role of apartments within statutory planning guidance. Apartment developments are continuing to become an increasingly more common form of development in urban areas however in order for Ireland to close the gap between itself European averages they need to become the norm for urban housing solutions.

The presented Residential Development at Holywell, Swords, recognises the need for further residential demand in Swords and in response offers a solution that is in line with the context for *Housing for All* and the *National Planning Framework*. The development is in compliance of the standards that have been set out in the above guidelines as well as the following Specific Planning Policy Requirement (SPPR):

(SPPR) Minimum Apartment Floor Areas:

- Studio apartment (1 person) 37 sq m;
- 1-bedroom apartment (2 persons) 45 sq m;
- 2-bedroom apartment (4 persons) 73 sq m; and
- 3-bedroom apartment (5 persons) 90 sq m.



Statement of Consistency – Sustainable Urban Housing: Design Standards for New Apartments (2022)

The presented scheme demonstrates that it is in compliance and support of the goals and the development criteria that has been outlined in the guidance document above through careful design and adherence. By developing to the aforementioned standards, it will allow for projected areas of expansion to be fulfilled as well as population growth and demographic trends to be accounted for to a manner that is in line with proper planning and sustainable development. The result of this will be the delivery of a series of high-quality residential units that are attractive in an area that is accessible and has been projected to expand.

4.0 CONCLUSION

Principle of Development Acceptable – Plan Led and Policy Consistent: It is submitted that the presented development is consistent with the zoning objectives for the subject site as discussed in the above sections as well as being in alignment with local and national planning policy. The presented use of this zoned land is primarily for residential development, with the most southern tip/part zoned open space and physically severed from the new Residential Development by the existing hedgerow vegetation and thereby integrated within the overall open space features of the existing Holywell Residential developed area. The typology of the residential units presented reflects the needs of the area.

The presented development fully accords with the land use categories as set out by the *Fingal Development Plan 2023-2029*, for the reasons more fully examined within this *Planning Statement* and as such supports the rationale for the application as being 'Plan-Led' and as presented in terms of consistency herein.

Sustainable Neighbourhoods: We submit that the presented density of the subject application represents an efficient and sustainable use of serviced infill zoned lands, primarily residential while acknowledging the public open space amenity lands in the south, and would be in keeping the proper planning and sustainable development of the area.

The presented development will provide a mix of available residential units proximate to the existing and expanding residential neighbourhoods, which can be supported due to the proximity of active travel options and public transport such as bus services. Accessibility to a range of community infrastructure, employment opportunities, and educational institutes, as described above and referred, benefits and supports the subject development presented.

Better Use of Land: The presented development delivers a 57 no. residential unit development on an infill greenfield site, presenting a range of unit sizes (20 no. 1-bedroom apartments, 29 no. 2-bedroom apartments, and 8 no. 3-bedroom apartments) effectively integrated within its receiving environment acknowledging existing neighbouring residential amenity, and presents amenity space in alignment with the provisions of the Development Plan.

The subject scheme presents a reflective and respectful density of residential development within Fingal, in close proximity to places of employment, transport infrastructure and associated services, accessible by foot, bicycle and public transport, all key factors in ensuring the expected increase in population.

Principle of the Presented Development of a High-Quality Design and Layout: Development Management Standards as contained within the *Fingal County Development Plan 2023-2029* and as required to be in accordance with prevailing Ministerial Guidelines have been considered alongside the appropriate and previously referred *Guidelines for Sustainable Residential Development in Urban Areas (2009)*, *Housing for All – A New Housing Plan for Ireland (2021)* and *Urban Development and Building Heights – Guidelines for Planning Authorities (2018)*.

The presented development is consistent with the policies outlined for large towns and cities in the *Guidelines for Planning Authorities on Sustainable Urban Development in Urban Areas (2009)*. As well as being plan-led, the presented development contributes to the densification of the infill greenfield subject site, allowing for higher density to occur in this location.

The presented development represents the introduction of a new range and mix of housing types and sizes, having a positive impact on the wider area without effecting the neighbourhood amenity. The 57 no. units are considered an appropriate design response presenting a high-quality housing scheme with a range of unit size, increasing the opportunity to access the housing market by providing housing units at a requisite scale and massing, with a permeable layout that allows the area to become more accessible for pedestrians while effectively integrating within its receiving environment by acknowledging existing neighbouring residential amenity.

A Connected, Inclusive and Distinctive Community: The presented development is consistent with the policies outlined for large towns and cities in the *Guidelines for Planning Authorities on Sustainable Urban Development in Urban Areas (2009)*. As well as being plan-led, the presented development contributes to the densification of the infill greenfield site and lands in a manner intended envisaged by the Local Authority.

The guidelines as relate to, *inter alia*, daylight/sunlight and energy efficiency, privacy and security, car and bicycle parking, the provision of private and communal open space, residential density, accessibility, waste services have all been carefully considered in the design and layout of the presented scheme.

Having regard to the *Fingal Development Plan 2023-2029* and the development of a Residential Development as presented for the Holywell, Swords, site primarily subject to the *RS- Residential* zoning designation confirming *inter alia* that a *Residential Development* is 'Permitted in Principle', whilst acknowledging the *OS – Open Space* zoned public open space amenity lands in the south, Statutory Guidelines for Planning Authorities on residential development in response to *Project Ireland 2040*, National Policy Objectives contained within the *National Planning Framework*, as well as the availability of public services, amenities and facilities, it is considered that the presented development of a new residential development at a site in Holywell, Swords, will enhance both the character and amenity of the area and provide much needed housing to satisfy plans for local expansion and future housing targets.

Accordingly, the presented development integrates successfully within its receiving environment and neighbouring sites, is not detrimental to the visual or landscape amenities of the area, does not seriously injure the residential amenities of property in the vicinity, will not adversely impact on the cultural and build heritage of the area, is not prejudicial to public health and does not interfere with the existing land uses in the area. The presented development would, therefore, be in accordance with the proper planning and sustainable development of the area while integrating within the current Swords built environment.

Yours faithfully



Wessel Vosloo MIPI
Principal
The Planning Partnership

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